

**Baker & Hostetler LLP**

45 Rockefeller Plaza  
New York, NY 10111  
Telephone: (212) 589-4200  
Facsimile: (212) 589-4201  
David J. Sheehan  
Nicholas J. Cremona  
Dean D. Hunt

*Attorneys for Irving H. Picard, Trustee  
for the Substantively Consolidated SIPA Liquidation  
of Bernard L. Madoff Investment Securities LLC  
and the Estate of Bernard L. Madoff*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION  
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Substantively  
Consolidated SIPA Liquidation of Bernard L.  
Madoff Investment Securities LLC and Bernard L.  
Madoff,

Plaintiff,

v.

ESTATE OF ARNOLD M. SOSKIN; ARNOLD  
M. SOSKIN REVOCABLE TRUST; RICHARD  
N. SOSKIN, individually and in his capacity as

Adv. Pro. No. 10-04505 (SMB)

personal representative of the Estate of Arnold M. Soskin and as Trustee of the Arnold M. Soskin Revocable Trust; NANCY S. LURIE, individually and in her capacity as personal representative of the Estate of Arnold M. Soskin and as Trustee of the Arnold M. Soskin Revocable Trust; DEBRA BECKER; ROBERT S. SOSKIN; SAMUEL S. SOSKIN; and RENEE R. SOSKIN,

Defendants.

**STIPULATION AND ORDER FOR VOLUNTARY DISMISSAL  
OF ADVERSARY PROCEEDING WITH PREJUDICE**

Irving H. Picard (the “Trustee”), as trustee for the liquidation of the business of Bernard L. Madoff Investment Securities LLC (“BLMIS”) under the Securities Investor Protection Act, 15 U.S.C. §§ 78aaa, *et seq.* (“SIPA”), and the substantively consolidated estate of Bernard L. Madoff individually (“Madoff”), by and through their counsel, Baker & Hostetler LLP, and Defendants i) Estate Of Arnold M. Soskin; (ii) Arnold M. Soskin Revocable Trust; (iii) Richard N. Soskin, individually and in his capacity as personal representative of the Estate of Arnold M. Soskin and as Trustee of the Arnold M. Soskin Revocable Trust; (iv) Nancy S. Lurie, individually and in her capacity as personal representative of the Estate of Arnold M. Soskin and as Trustee of the Arnold M. Soskin Revocable Trust; (v) Debra Becker; (vi) Robert S. Soskin; and (vi) Samuel S. Soskin; by and through their counsel Stephen M. Pincus of Anthony Ostlund Baer & Louwagie, P.A.; and (viii) Renee R. Soskin, by and through her counsel, Lawrence M. Shapiro of Greene Espel, PLLP (collectively, the “Parties”), hereby stipulate and agree to the following:

1. On November 30, 2010, the Trustee filed and served the Complaint against Defendants.
2. On March 2, 2015, Defendant Renee R. Soskin filed and served her Answer to the

Complaint on the Trustee.

3. On March 16, 2015, the remaining defendants filed and served their Answer to the Complaint on the Trustee.

4. Pursuant to the Settlement Procedures Order, entered by this Court on November 12, 2010 [Dkt. No. 3181], the Parties entered into a Settlement Agreement and Release on December 6, 2016.

5. In accordance with Federal Rule of Bankruptcy Procedure 7041(a)(1)(ii), and Federal Rule of Civil Procedure 41(a)(1), the Parties hereby stipulate to a dismissal with prejudice of the Trustee's claims against Defendants in the above-captioned adversary proceeding and dismissal of the adversary proceeding with prejudice.

6. The provisions of this Stipulation shall be binding upon and shall inure to the benefit of the Parties and their respective successors and assigns and upon all creditors and parties of interest.

7. This Stipulation may be signed by the Parties in any number of counterparts, each of which when so signed shall be an original, but all of which shall together constitute one and the same instrument. A signed facsimile, photostatic or electronic copy of this Stipulation shall be deemed an original.

8. The Bankruptcy Court shall retain jurisdiction over this Stipulation.

Date: December 12, 2016  
New York, New York

**BAKER & HOSTETLER LLP**

By: /s/ Nicholas J. Cremona  
45 Rockefeller Plaza  
New York, New York 10111  
Telephone: (212) 589-4200  
Facsimile: (212) 589-4201  
David J. Sheehan  
Email: dsheehan@bakerlaw.com  
Nicholas J. Cremona  
Email: ncremona@bakerlaw.com

*Attorneys for Irving H. Picard, Trustee for the  
Substantively Consolidated SIPA Liquidation  
of Bernard L. Madoff Investment Securities  
LLC and the Estate of Bernard L. Madoff*

Of Counsel:

**BAKER & HOSTETLER LLP**

811 Main Street, Suite 1100  
Houston, Texas 77002-6111  
Telephone: (713) 751-1600  
Facsimile: (713) 751-1717  
Dean D. Hunt  
Email: dhunt@bakerlaw.com  
Farrell A. Hochmuth  
Email: fhochmuth@bakerlaw.com

**ANTHONY OSTLUND BAER &  
LOUWAGIE, P.A.**

By: /s/ Stephen M. Pincus  
90 South 7<sup>th</sup> Street  
3500 Wells Fargo Center  
Minneapolis, Minnesota 55402  
Telephone: (612) 349-6969  
Facsimile: (612) 349-6996  
Richard T. Ostlund  
Email: rostlund@anthonyostlund.com  
Steven M. Pincus  
Email: spincus@anthonyostlund.com

*Attorneys for Defendants Estate Of Arnold M.  
Soskin, Arnold M. Soskin Revocable Trust,  
Richard N. Soskin, individually and in his  
capacity as personal representative of the  
Estate of Arnold M. Soskin and as Trustee of  
the Arnold M. Soskin Revocable Trust, Nancy  
S. Lurie, individually and in her capacity as  
personal representative of the Estate of Arnold  
M. Soskin and as Trustee of the Arnold M.  
Soskin Revocable Trust, Debra Becker, Robert  
S. Soskin and Samuel S. Soskin*

**GREENE ESPEL PLLP**

By: /s/ Lawrence M. Shapiro  
Campbell Mithun Tower  
Suite 2200  
222 South Ninth Street  
Minneapolis, Minnesota 55402-3362  
Telephone: (612) 327-8378  
Facsimile: (612) 373-0929  
Lawrence M. Shapiro  
Email: LShapiro@greeneespel.com

*Attorneys for Defendant Renee R. Soskin*

SO ORDERED:

Dated: December 12<sup>th</sup>, 2016  
New York, New York

/s/ STUART M. BERNSTEIN  
Hon. Stuart M. Bernstein  
United States Bankruptcy Judge